



**BURLINGTON  
ENVIRONMENTAL**

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WAD 00081 2917

FF# 17a

1/29/1993

RCRA PERMITS SECTION

January 29, 1993

CERTIFIED MAIL

FILE COPY

Mr. Joshua Chaitin  
WA Dept. of Ecology, NWRO  
3190 - 160th Ave. SE  
Bellevue, WA 98008-5452

Mr. Chaitin:

Burlington Environmental Inc. (BE) has received Ecology's December 22, 1992 letter (attached) with comments and request for additional information regarding the BE Pier 91 closure plan addressing those portions of the interim status facility which are not addressed in the Part B Closure Plan. This closure plan was submitted on October 23, 1992 per permit condition IV.F.1. of the BE Pier 91 Facility Part B Permit. Attached are the revised pages of the closure plan, and a certification statement.

**COMMENT 1**

*Characterization of material emptied from tanks 115-118 and 165;*

The material emptied from these tanks was similar to the material removed from Tanks L, M, and E, and consisted of waste oils, machine coolants, and wastewaters characterized as a Washington State only dangerous waste (WT02). This material was processed on-site at the Pier 91 Facility using standard treatment methods. Upon final decontamination, the residuals from these tanks will be characterized and managed, if appropriate, as a dangerous waste. Section 2.3 is revised to reflect this approach.

*Section HH as it relates to Section I;*

Attachment (Section) HH of the Part B Permit references Section I of the Part B Permit Application. BE will follow closure procedures described in the Part B Permit Application Section I (referenced as Part B Permit Attachment HH). Section 2.3 is revised to clarify this relationship.

*Time line for closure of Tanks 115-118, and 165;*

As described in the final paragraph of Section 2.3, BE will decontaminate these tanks within 90 days after Ecology's approval of this closure plan.



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## COMMENT 2

The decontamination methods (high pressure wash, hydroblasting) described in the closure plan (Section I, Attachment HH) do not require sampling and analysis of the rinsate or the tank itself. The decontamination method requires triple rinsing and removal of all visible material. The method is the standard.

## COMMENT 3

Prior to the 1981 sublease, Burlington Environmental Inc. (then Chemical Processors, Inc.) did not lease the tanks to PANOCO, but rather operated the tanks for a throughput charge to PANOCO. The tanks were used exclusively for virgin bunker/diesel oil purchased and sold by PANOCO. Therefore, the historical use of the tanks has not changed, only the contractual relationship. Section 2.1 is revised to clarify the PANOCO arrangement described above..

If you have any questions or require further information, please contact me at (206) 654-8153.

Sincerely,



John Stiller  
Environmental Compliance Manager

cc: Mr. David Croxton, USEPA X  
Mr. Doug Brown, Ecology - Permits



BURLINGTON  
ENVIRONMENTAL

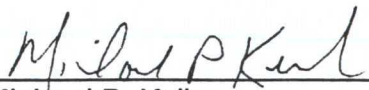
January 29, 1993

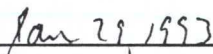
Part B Permit Condition IV.F.1.  
Submittal

As required by WAC 173-303-810(12) and (13), Burlington Environmental Inc. (BE) is providing the following certification statement for submittal of information required under permit condition IV.F.1. of the BE Pier 91 Facility, submitted to the Washington Department of Ecology on January 29, 1993. If you have any questions regarding this matter, please contact John Stiller at (206) 654-8153.

**CERTIFICATION STATEMENT**

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

  
\_\_\_\_\_  
Michael P. Keller  
Sr. Vice President, Plant Operations

  
\_\_\_\_\_  
Date







STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

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DEC 23 1992

BURLINGTON ENVIRONMENTAL INC.  
CORPORATE OFFICE

December 22, 1992

Mr. John Stiller  
Burlington Environmental Inc.  
2203 Airport Way South  
Suite 400  
Seattle, WA 98134

Dear Mr. Stiller:

Re: Designation of Materials Removed From Interim Status Tanks at Pier  
91 Facility, WAD000812917

Thank you for sending me the Closure Plan for the Pier 91 Facility. I  
have reviewed the information in the plan and at this point request that  
the following additions and/or corrections be made:

1. Please make available any analytical data regarding the  
designation of the materials emptied from tanks 115, 116,  
117, 118, and 165 in 1989, as described in section 2.3 of  
the closure plan, it should be sent to me for review and  
should be included in the plan. Specifically, this  
information should address whether or not the materials  
removed from these tanks are designated as dangerous waste.

In addition, you state that tanks being removed from  
dangerous waste service will undergo decontamination  
procedures outlined in the closure plan, section HH. In the  
Pier 91 Facility permit application, closure information is  
contained within Section I. Please indicate whether or not  
the procedures outlined in Section I are the closure  
procedures that will be used to the above referenced tanks.  
If not, please provide a description of the procedures to be  
used. In addition, please indicate a time line for these  
closure activities.

2. In the Closure Plan, no reference is made to standards for  
sampling and analysis; please include such information or  
make reference to an already existing plan that you intend  
to use.
3. In the Closure Plan, you make reference to the fact that  
certain tanks are, and historically have been, operated by  
the Pacific Northern Oil Company (PANOCO). In the body of  
the report, you reference the original lease as dating back

Mr. John Stiller  
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December 22, 1992

to 1974. The lease copy provided in the appendices to the report however, is dated 1981 and is apparently a revised version. Please send a copy of the original PANOCO lease or provide an explanation of the inclusion of the revised lease only.

Thank you for your cooperation in this matter. Please contact me with any questions at 649-7216.

Sincerely,



Joshua Chaitin  
Hazardous Waste Inspector  
Solid and Hazardous Waste Program

JC:jc:cw

cc: Julie Sellick, Ecology  
Barb Smith, Ecology  
Galen Tritt, Ecology  
Doug Brown, Permits  
David Croxton, EPA-Region X  
Sue Roth, Kennedy-Jenks Consultants

CLOSURE OF INTERIM STATUS AREA

BURLINGTON ENVIRONMENTAL INC.  
PIER 91 FACILITY

In Response to Section IV.F.1,  
Washington Department of Ecology  
Permit No. WAD 000812917

October 23, 1992

Revised: January 29, 1993

## CLOSURE OF INTERIM STATUS AREA

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## **1.0 Introduction**

The Pier 91 tank facility is owned by the Port of Seattle and leased to Burlington Environmental Inc. Tanks, containment, pipelines and property are owned by the Port of Seattle. A portion of the tank facility is subleased to Pacific Northern Oil Corporation (PANOCO). The PANOCO facility stores and blends residual fuel oil and diesel fuel. The original RCRA Part A application submitted in 1980 by Chemical Processors, Inc. (now Burlington Environmental Inc.) included all the tanks located at the Pier 91 facility, including tanks subleased to PANOCO. As such, the whole of the facility had interim status. The Part B area includes only a portion of the previous interim status area. This plan addresses Section IV.F.1. of the RCRA Part B Permit issued by the Washington Department of Ecology. Section IV.F.1. requires Burlington Environmental Inc. to submit a closure plan for the interim status area as defined in Attachment MM of the Part B permit. The following plan addresses the equipment decontamination of tanks within the interim status area.

Figure 1.0 shows the location of all tanks at the Pier 91 Facility. For further reference, a table is provided in Appendix 1 which summarizes the past and current service of the Pier 91 Facility tanks.

## **2.0 Equipment Closure**

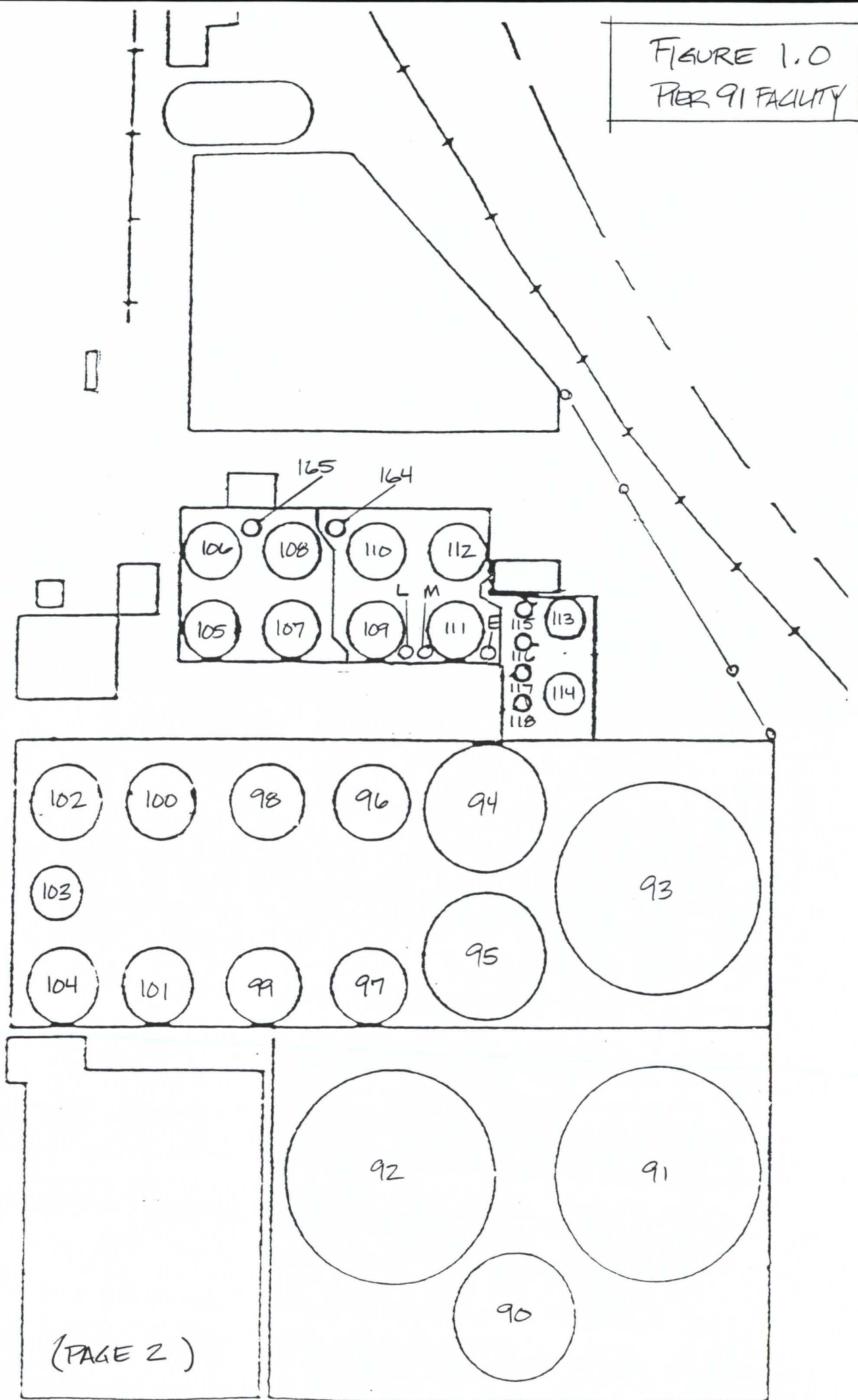
### **2.1 Product Storage Tanks in PANOCO Service**

Since 1974, tanks 91, 92, 93, 95, 101, 102, 103, 104, and 113 have been used exclusively for virgin bunker/diesel oil purchased and sold by PANOCO. Prior to the 1981 sublease, Burlington Environmental Inc. (then Chemical Processors, Inc.) did not lease the tanks to PANOCO, but rather operated the tanks for a throughput charge to PANOCO. Therefore, the historical use of the tanks has not changed, only the contractual relationship.

The PANOCO lease of May 1981 is provided in Appendix 2 as documentation that these tanks are in PANOCO fuel and oil product service. Equipment closure documentation is not provided for Tanks 91, 92, 93, 95, 101, 102, 103, 104 and 113 since these tanks have not been utilized for dangerous waste service. See Figure 1.0 for the location of these tanks.



FIGURE 1.0  
PIER 91 FACILITY



## **2.2 Decontaminated Tanks Currently in Non-Dangerous Waste Service**

The tanks in the following table (Table 1.0) are in use by Burlington Environmental Inc., and have been in non-dangerous waste service since they were taken out-of-service and decontaminated. The type of material currently contained in these tanks includes waste oil, oily wastewater and boiler condensate return water. Documentation for the decontamination of these tanks is outlined in Table 1.0 below, and copies of significant papers are provided in Appendix 4.

The tanks listed in the following table (Table 1.0) were emptied, cleaned, decontaminated via high pressure washers and steam cleaners, and inspected as part of Burlington Environmental's Tank integrity program. This tank integrity program was conducted pursuant to WAC 173-030-640 (2)(a). Professional tank cleaning crews were hired in order to empty, clean and decontaminate these tanks for entry and evaluation by tank and corrosion specialists. All decontamination wastewaters were treated in the Pier 91 facility wastewater treatment system and were discharged pursuant to the Pier 91 facility's POTW discharge permit with METRO. Sludges removed during the cleaning process were dewatered using a centrifuge, and the dry sludges were shipped to the hazardous waste landfill operated by CWMNW in Arlington, Oregon. Example manifests (#17423 and #17456) used during the shipments are included in Appendix 3 along with laboratory analysis conducted on the waste. Initial waste analysis demonstrated that the waste did not pass TCLP for certain metals. Subsequent analysis showed that the material passed the TCLP and was therefore not hazardous waste (this waste was shipped as WT02). Both types of manifests are provided.

TABLE 1.0 SUMMARY OF TANK DECONTAMINATION  
Pier 91 Facility

TANK	DATE COMPLETE (Approximate)	AVAILABLE DECONTAMINATION DOCUMENTATION
90	Feb. 1991	-Daily Gauge Forms -Daily Cost Sheets -Corporate Tank Entry Permit -Plant Manager Certification of Decontamination
94	October, 1990	-Daily Gauge Form -Corporate Tank Entry Permit -Plant Manager Certification of Decontamination
96	August, 1990	-Daily Gauge Forms -Daily Cost Sheet -Plant Manager Certification of Decontamination
97	June, 1990	-Daily Gauge Forms -Daily Cost Sheets -Corporate Tank Entry Permit -Inspection conducted by Corrosion Engineers -Plant Manager Certification of Decontamination
98	Sept. 1990	-Daily Gauge Forms -Plant Manager Certification of Decontamination
99	July, 1990	-Daily Gauge Forms -Daily Cost Sheets -Plant Manager Certification of Decontamination
100	July, 1990	-Daily Gauge Forms -Daily Work Orders -Daily Cost Sheets -Plant Manager Certification of Decontamination

TABLE 1.0 SUMMARY OF TANK DECONTAMINATION  
(Continued)

TANK	DATE COMPLETE	AVAILABLE DECONTAMINATION DOCUMENTATION
105	Jan. 1990	-Daily Gauge Forms -Internal Corporate Invoice for labor, equipment and materials -Integrity Assessment -Plant Manager Certification of Decontamination
106	Jan. 1990	-Daily Gauge Forms -Daily Cost Sheets -Plant Manager Certification of Decontamination
107	Dec. 1989	-Daily Gauge Forms -Daily Cost Sheets -Integrity Assessment for Tank and Ancillary Equipment -Plant Manager Certification of Decontamination
108	Jan. 1990	-Daily Gauge Form -Daily Cost Sheets -Plant Manager Certification of Decontamination
114	Jan. 1990	-Daily Gauge Forms -Internal Corporate Invoice for labor, equipment and materials -Integrity Assessment -Plant Manager Certification of Decontamination
Pit Separator	July, 1990	-Daily Cost Sheets -Corporate Tank Entry Permit -Plant Manager Certification of Decontamination
L,M,E	Sept. 1992	-Daily Gauge Form -Plant Manager Certification of Decontamination



### **2.3 Out-of Service Tanks Requiring Decontamination**

There are several remaining interim status tanks which were emptied in 1989. These tanks are out-of-service and require decontamination. The tanks which require decontamination include Tanks 115, 116, 117, 118 and 165. As indicated in Ecology's Part B Permit for the Storage and Treatment of Dangerous Waste at the Pier 91 Facility, tanks removed from dangerous waste service will undergo decontamination as specified by procedures in the closure plan, Attachment HH (Section I of the Part B Permit Application).

Tanks will be triple rinsed using a high-pressure wash and an appropriate cleaning solution. In compliance with Section III.D.1 of the Pier 91 permit, hydroblasting will follow the guidelines in the EPA document 600/2-85/028 "Guide for Decontaminating Buildings, Structures and Equipment at Superfund Sites". The Guide discusses the effectiveness of hydroblasting at high pressures of a minimum of 3,500 kPa (Approx. 500 psi) and higher. The water jet spray used for decontamination will be adjusted to at least 500 psi. Rinsate and cleaning residue from all three washings will be managed as a hazardous waste. The collected rinsate will be appropriately treated on-site, or when necessary, sent off-site for treatment and disposal at a RCRA-permitted facility. Decontaminated tanks 115, 116, 117, 118, and 165 will eventually be removed and replaced with RCRA service tanks (Part B) as economic and market conditions dictate.

These tanks are scheduled for decontamination within 90 days after Ecology's approval of this plan.

### **2.4 Part B RCRA Service Tanks**

Tanks 109, 110, 111, 112 and 164 are tanks which formerly had interim status and are included in the RCRA Part B Permit. These tanks are currently in dangerous waste service and are planned to be closed during the final closure of the facility.

## **3.0 Soil and Groundwater Cleanup**

Burlington Environmental Inc. has signed a 3008 (h) Order with EPA to proceed with the clean up of Pier 91 Facility contamination which can be attributed to hazardous waste and hazardous waste constituents stored and processed by Burlington Environmental Inc. The 3008(h) Order requires Burlington Environmental to conduct a Remediation & Feasibility Investigation (RFI). The work described in the approved RFI, dated July 9, 1992, is ongoing. It is through this process that cleanup of soil and/or groundwater in the interim status facility will be addressed.